

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

**AFFIDAVIT AND DISCLOSURE STATEMENT OF Theodore A. Krebsbach,
ON BEHALF OF Krebsbach & Snyder, P.C.**

STATE OF New York)
COUNTY OF New York) ss:

Theodore A. Krebsbach, being duly sworn, upon his oath, deposes and says:

1. I am a member of Krebsbach & Snyder, P.C. located at 55 Broadway, Suite 1600, New York, NY 10006 (the “Firm”).

2. Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the “Debtors” and, collectively with their non-debtor affiliates, “Lehman”), have requested that the Firm provide litigation, collection and other legal services to the Debtors, and the Firm has consented to provide such services.

3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these

chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

5. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates.

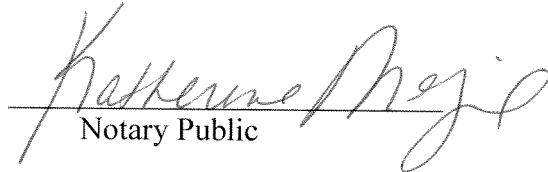
6. The Debtors do not owe the Firm any money for prepetition services.

7. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.¹

By: 

Theodore A. Krebsbach

Subscribed and sworn to before me
this 11th day of March, 2009


Notary Public

KATHERINE MCGRAIL
NOTARY PUBLIC, STATE OF NEW YORK
NO. 02MC6154241
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES 10/23/2010

¹ If necessary.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	:
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	:
	:
Debtors.	:
	:
	:
-----X	

Chapter 11 Case No.
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(Jointly Administered)

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively, the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Jennifer Sapp
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Krebsbach & Snyder, P.C.

55 Broadway, Suite 1600

New York, NY 10006

(212) 825-9811

2. Date of retention: March 5, 2009

3. Type of services provided (accounting, legal, etc.): Legal services;
including litigation and collection work
4. Brief description of services to be provided:
Legal representation in litigation, regulatory, arbitration, collection and
related proceedings
5. Arrangements for compensation (hourly, contingent, etc.)
Hourly rates
- (a) Average hourly rate (if applicable):
Partner - \$362.50; Of Counsel - \$295.00; Associates - \$225.00
- (b) Estimated average monthly compensation based on prepetition
retention (if firm was employed prepetition):
Not applicable
6. Prepetition claims against the Debtors held by the firm:
Amount of claim: None
Date claim arose: Not applicable
Source of Claim: Not applicable
7. Prepetition claims against the Debtors held individually by any member,
associate, or professional employee of the firm:
Name: None
Status: Not applicable
Amount of Claim: Not applicable
Date claim arose: Not applicable

Source of claim: Not applicable

8. Stock of the Debtors currently held by the firm:

Kind of shares: None

No. of shares: Not applicable

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: None

Status: Not applicable

Kind of shares: Not applicable

No. of shares: Not applicable

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

None

11. Name of individual completing this form:

Theodore A. Krebsbach